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May 28, 2013

Quy Vuong
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

Re: ID number C00489799, Amended 30 Day Post-General Report (Form 3X, 10/18/2012-11/26/2012, received 1/31/2013)

Dear Mr. Vuong:

We have received your letter of April 23, 2013, requesting additional information in regard to the Amended 30 Day Post-General Report (1018/2012-11/26/2012) of Parenthood Votes (?Votes?), received by the FEC on 1/31/2013 (hereafter, "Amended Post-General Report").

Question 1 of your letter asks for clarification regarding why the Amended Post-General Report disclosed receipts totaling \$100,000 which were not shown on the original report.

The receipts that appear on the Amended Post-General Report that were not shown on the original report represent the contributions of two individuals, Donald Rubin and Shelley Rubin, each of whom contributed \$50,000 to Votes in wire transfers received by the Votes bank account on November 5, 2012.

Unlike check and credit card deposits (the vast majority of Votes? contributions), which are received directly into the Votes? mailroom in hard copy, Votes has no knowledge of wire transfers into its account unless it checks the account?s on-line records. According to Votes? normal procedures in effect at that time, the Senior Accountant would have downloaded information about all wire transfers into the Votes? account on a daily basis and provided that information to the Accounting Clerk, who would have sorted donor contributions to Votes from other items and sent the information on contributions to the Development department for entry into Votes? data base of contributors. Those entries in the contributor data base form the basis for the report on contributors provided to the FEC.

On the day the Rubins? wires were received, and for the subsequent week, the Senior Accountant, who normally checked the Votes account, was unable to return to work because of power outages in the wake of Hurricane Sandy. A substitute employee checked the Votes? account on November 9 but, because it was not part of her normal duties, neglected to provide information on the Votes? wires to the Accounting Clerk. Hence, the information was not relayed to the Development department and not entered into the contributor data base in time to appear on the post general report filed on December 6, 2012. While such an error would normally have been discovered in the reconciliation of monthly bank records to the record of contributors in time for the regular monthly FEC reports (due on the 20th day after the end of the previous month), in the case of the Post-General Report, due on December 6, 2012, the bank records for November were not yet available for reconciliation at the time the original report was filed.

Votes has since revised its procedures to allow the Accounting Clerk and additional employees access to Votes? on-line bank records and to require that the employee checking records ensure that information about Votes? wire contributions are relayed to the Development department on the same day the bank makes them accessible for viewing on-line.

Question 2 of your letter asks for an amendment of the Post-General Report to show payments for debts on Schedules B, E or H4, rather than as memo entries on Schedule B. The amended Post-General Report filed on May 17, 2013 made the requested changes.

Please contact me if you need any further information.

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Yours sincerely,

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